

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

CENTRAL STATES JOINT BOARD HEALTH & )  
WELFARE TRUST FUND, )

Plaintiff, )

vs. )

ROMELIA DAYSON, an individual; )  
ROMEO DAYSON, an individual; and )  
TAXMAN, POLLOCK, MURRAY & )  
BEKKERMAN, LLC, an Illinois limited liability )  
company, )

Defendants. )

Case No.: 21-cv-6860

Judge: Mary M. Rowland

Mag. Judge: Jeffrey  
Cummings

**DEFENDANTS' RULE 68 OFFER OF JUDGMENT**

Defendants Romelia Dayson, Romeo Dayson, and Taxman, Pollock, Murray & Bekkerman, LLC (collectively “Defendants”), through their attorneys Michael Murphy Tannen and Timothy R. Meloy of Tannen Law Group, P.C., hereby tender their offer of judgment to Plaintiff Central States Joint Board Health & Welfare Trust Fund (“Plaintiff”) pursuant to Federal Rule of Civil Procedure 68.

1. Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants hereby offer to allow judgment be taken against them in this action in the sum of eighty-two thousand and five hundred dollars (\$82,500.00) in favor of Plaintiff for full and complete resolution of Plaintiff’s claims as set forth in her complaint against the Defendants in the above-captioned suit (“the Action”), including costs and reasonable attorney’s fees accrued to date.

2. This offer of judgment is intended to fully and completely provide Plaintiff with relief for all claims as set forth in the Action by Plaintiff against Defendants.

3. Plaintiff is hereby on notice that if it does not accept this offer of judgment within fourteen (14) days of service, and if the judgment that Plaintiff finally obtains after litigating this matter to the fullest is not more than the unaccepted offer, Plaintiff will be responsible pursuant to Federal Rule of Civil Procedure 68(d) for paying Defendants' costs accrued in this litigation after this offer was made, including reasonable attorney's fees under 29 USC 1132(g)(1).

4. Pursuant to Federal Rule of Civil Procedure 68, this offer of judgment shall remain open for fourteen (14) days following the date of service.

5. This offer of judgment is made solely for purposes of Federal Rule of Civil Procedure 68 and shall not constitute or otherwise be construed as an admission of liability in any respect, including, without limitation, by Defendant Romeo Dayson as a participant under Plaintiff's fund or by Taxman, Pollock, Murray & Bekkerman, LLC which is currently holding settlement proceeds from Defendant Romero Dayson's lawsuit against Alexian Brothers Medical Center per an agreed order in this case (Doc. No. 11).

Respectfully Submitted,

TANNEN LAW GROUP, P.C.

By: /s/ Michael M. Tannen

Attorneys for Defendants Romelia Dayson,  
Romeo Dayson, and Taxman, Pollock, Murray  
& Bekkerman, LLC

Michael Murphy Tannen (#6204635)  
*mtannen@tannenlaw.com*  
Timothy R. Meloy (#6325769)  
*tmeloy@tannenlaw.com*  
Tannen Law Group, P.C.  
77 w. Washington St., Ste. 500  
Chicago, Illinois 60602  
312.641.6650